

## REMARKS

Claims 1-23 are pending.

Claims 1-6, 9, 11-17, 19, 20, 22 and 23 are rejected under 35 USC 103(a) as being unpatentable over Estes (US Pub. 2003/0208411) in view of Franklin (US Patent No. 6,125,352).

Claims 7 and 18 are rejected under 35 USC 103(a) as being unpatentable over Estes, Franklin and Kirner (US Pub. 2002/00446040).

Claims 10 and 21 are rejected under 35 USC 103(a) as being unpatentable over Estes, Franklin and Iannacci (US pub. 2002/0062249).

The claims are amended, and, thus the pending claims remain for reconsideration, which is requested. No new matter has been added.

The independent claims are 1, 6, 12, 17 and 23, which are rejected over Estes and Franklin. The rejection is traversed as follows:

In the present invention, an address identification (ID) is generated according to a delivery request, providing a benefit that the correspondence between the generated address ID and actual address are dynamically changed. To clarify, claim 1 is amended to require "acquiring, ~~address data~~ from a purchaser wishing to purchase and have merchandise delivered, **address data including delivery addresses of the purchaser and a non-purchaser** the ~~acquiring storing a plurality of delivery addresses, including addresses of one or a plurality of non-purchasers; establishing~~ **generating a respective unique address identification (ID) for each of the plurality of delivery addresses in the address data ..., the unique address IDs** ~~being invulnerable to reverse translation by a third party into the address data, ... managing a correspondence table indicating correspondence between the address data, which includes the delivery addresses of the purchaser and the non-purchaser, and the generated respective unique address ids.~~" For example, the present application page 15, lines 1-24 support the claims.

In both cited references, Estes and Franklin, the correspondence of address data and address ID are fixed. In particular, the Response to Arguments relies upon Franklin's 'saving multiple addresses for one user,' however, the configuration of Franklin is for making easy search of address data, i.e., to easily search for a delivery address, by assigning a friendly nick name to a plurality of delivery addresses for a user (see relied upon Franklin column 23, line 61

to column 24, line 13). Accordingly, in Franklin, the correspondence of address data and address ID should be fixed to make browsing/searching of delivery addresses easy. The present invention aims to provide a benefit that the actual address data cannot be detected from the address ID by dynamically changing the correspondence between the generated unique address ID and actual address. Even a person having ordinary skill in the art cannot achieve to combine Franklin and Estes that aim for making easy search of address data to achieve the benefit of the present invention. In other words, if the configurations of Estes and Franklin would be combined, the combination would not achieve a configuration of the present invention that the correspondence of the address data and unique address ID are dynamically changed.

And there is no evidence, either expressly or implicitly, in Estes and Franklin that one skilled in the art would modify Franklin's easy delivery address search to provide the claimed "acquiring ~~address data~~ from a purchaser wishing to purchase and have merchandise delivered, address data including delivery addresses of the purchaser and a non-purchaser the acquiring storing a plurality of delivery addresses, including addresses of one or a plurality of non-purchasers; establishing generating a respective unique address identification (ID) for each of the plurality of delivery addresses in the address data ..., the unique address IDs ~~IDs~~ being invulnerable to reverse translation by a third party into the address data, ... managing a correspondence table indicating correspondence between the address data, which includes the delivery addresses of the purchaser and the non-purchaser, and the generated respective unique address IDs," and seen a benefit of dynamically changing the correspondence between the generated address ID and actual address.

Withdrawal of the rejection of claim 1 and allowance of claim 1 is requested. Independent claims 6, 12, 17 and 23 are amended to require limitations similar to the discussed amended limitations of claim 1.

In addition, the language of claims 1, 12 and 23 require "establishing generating a respective unique address identification (ID) for each of the plurality of delivery addresses ... according to a request for issuing ~~an~~ a unique address ID from the purchaser," which is not disclosed expressly or implicitly by Estes or Franklin.

The remaining dependent claims inherit the patentable recitations of their respective base claims, and therefore, patentably distinguish over the cited art for the reasons discussed above in addition to the additional features recited therein.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,  
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